



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

CERTIFIED MAIL 7004 1160 0000 3793 7839
RETURN RECEIPT REQUESTED

Mr. Mark G. Jakel
Plant Manager
Georgia Gulf Lake Charles, LLC
1600 VCM Plant Road
Westlake, LA 70765

RE: Draft Hazardous Waste Operating Renewal Permit
Georgia Gulf Lake Charles, LLC
LAD 086478047 /AI#4013/ PER2000001

Dear Mr. Jakel:

Attached is your copy of the Georgia Gulf Lake Charles, LLC, draft hazardous waste operating renewal permit, LAD 086478047-OP-RN-1, which contains language pertaining to the operation of hazardous waste storage tanks and hazardous waste container storage areas at the Georgia Gulf Lake Charles, LLC, Westlake Facility.

A comment period of forty-five (45) days will be allowed in order for the public to review and comment on this draft hazardous waste post-closure permit. Specific dates for the beginning and ending of the comment period are contained in the attached public notice. A public hearing will be scheduled if requested during the public comment period in accordance with LAC 33:V.707 & 711.

Prior to taking a final action on the draft renewal permit, the administrative authority will consider all significant comments submitted on this action. Written comments must be submitted no later than 12:30 p.m. on the final day of the comment period. The issuance of the final permit decision will be in accordance with LAC 33:V.705.

Please reference your Agency Interest No. (4013), EPA ID No. (LAD 086 478 047), and PER 20000001 on all future correspondence pertaining to this matter. If you have any questions, please contact Mr. Craig Easley of the Waste Services Section at (225) 219-3050 or Ms. Soumaya Ghosn of the Public Participation Group at (225) 219-3276.

Sincerely,

Bijan Sharafkhani, P.E.
Administrator
Waste Permits Division

kce

Attachment

c: Kishor Fruitwala – EPA Region 6

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

FACT SHEET

**FOR THE DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT
PREPARED FOR**

**GEORGIA GULF LAKE CHARLES, LLC
Westlake Facility**

**EPA ID# LAD086478047
Agency Interest # 4013**

**1600 VCM Plant Road
Westlake, Louisiana
Calcasieu Parish**

**Permit Number LAD086478047-OP-RN-1
PER20000001**

I. INTRODUCTION

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft hazardous waste operating permit for Georgia Gulf Lake Charles, LLC, EPA ID Number LAD086478047, Agency Interest Number 4013, for the facility located in Westlake, Calcasieu Parish, Louisiana.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed draft hazardous waste operating permit to meet the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA).

Georgia Gulf Lake Charles, LLC is seeking a hazardous waste operating permit for the operation of two (2) hazardous waste tanks and two (2) container storage areas at its facility in Westlake, Louisiana.

II. THE PERMITTING PROCESS

The purpose of this fact sheet is to initiate the permit decision process. The LDEQ's Waste Permits Division is required to prepare this draft hazardous waste permit. The draft hazardous waste permit sets forth all the applicable conditions, which the permittee is required to comply with during the life of the permit. Georgia Gulf Lake Charles, LLC submitted its Hazardous Waste Part B Operating Permit Application, dated October 03, 2000, to comply with the Environmental Protection Agency (EPA) regulations requiring hazardous waste units to be permitted under Subtitle C of the Resource Conservation and Recovery Act (RCRA).

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the permittee to comply with the requirements of the LAC 33:V, Subpart 1, and the Hazardous and Solid Waste Amendments (HSWA) portion.

The public is given a minimum of forty-five (45) days to review and comment on the draft operating permit. The administrative authority, prior to making a decision or taking any final action on the draft permit, will consider all significant comments. The decision of the administrative authority shall be to issue, deny, modify, or revoke the draft operating permit in accordance with LAC 33:V.705.

A. NEW DRAFT HAZARDOUS WASTE PERMIT

The Waste Permits Division reviewed the permit application and other pertinent technical information and prepared a draft permit that contains the language that pertains to the operation, maintenance, and closure of the listed facilities.

This draft hazardous waste renewal permit is a tentative determination and is not the final decision of the administrative authority.

B. PUBLIC COMMENT PERIOD

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft permit for the Georgia Gulf Lake Charles, LLC - Westlake Facility must do so within the allotted forty-five (45) day comment period.

A public hearing for the draft permit will be held on the date, and at the location and time provided in the public notice (see the attached notice in the Public Participation Section of the Draft Permit). LDEQ will hold the hearing at least thirty (30) days after the date on which the public notice is given.

Public notice of the proposed permitting action and of the hearing shall be published in specified newspapers, announced on the designated radio station, and mailed to *those persons contained on the facility's mailing list*.

C. LOCATIONS OF AVAILABLE INFORMATION

The administrative record, including all supporting documents, is on file at the LDEQ Public Records Center, Room 1-127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at \$0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of the draft operating permit, fact sheet, and supporting documents are available for review at the **Calcasieu Parish Library, Westlake Branch, 937 Mulberry Street, Lake Charles, Louisiana 70669** and the **Calcasieu Parish Library, Sulphur Regional Branch, 1160 Cypress Street, Sulphur, Louisiana 70663-5111**.

D. WRITTEN COMMENT SUBMISSION

Interested persons may submit written comments on the draft operating permit to the administrative authority, at the address listed below, by the closing date of the comment period. All comments should include:

1. the name and address of the commenter,
2. a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,
3. identification of the facility commented on (the EPA Identification Number and AI number), and
4. supporting relevant facts upon which the comments are based.

All comments, further requests for information (including copies of this decision and fact sheet) and any requests by public interest groups or individuals, who would like to be included in the mailing list, should be made in writing to:

Ms. Soumaya Ghosn
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Mr. K. Craig Easley
Louisiana Department of Environmental Quality
Office of Environmental Services
Waste Permits Division
Post Office Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3050 or fax (225) 219-3158

III. DESCRIPTION OF OVERALL SITE

Georgia Gulf Lake Charles is the owner and operator of the Georgia Gulf - Westlake Facility. The facility manufactures 1, 2 - dichloroethane (EDC) and vinyl chloride monomer (VCM) and requires hazardous wastes to be containerized and stored prior to offsite disposal. The facility was originally constructed and operated by Conoco, a division of Dupont. The facility was named the Lake Charles Chemical Complex and contained the Normal Paraffin Unit, LPA Solvent Unit, Alcohol/Alumina Unit, Ethylene Unit, Ethoxylate Unit, Linear Alkyl Benzene Unit, and the VCM Unit. Vista Chemical Company purchased the facility from Conoco in 1984. Condea Vista later purchased the site from Vista Chemical in 1991. Georgia Gulf Lake Charles purchased the VCM Plant from Condea Vista in November 1999. All units of the Lake Charles Chemical Complex (referenced above), other than the VCM Plant purchased by Georgia Gulf Lake Charles, are owned and operated by Sasol North America, Inc.

IV. HAZARDOUS WASTE FACILITIES

Georgia Gulf Lake Charles owns and operates four (4) hazardous waste units at its Westlake Facility: two (2) hazardous waste tanks (T-405 and T-452) and two (2) container storage areas (CSA#2 and CSA#3). Both tank T-405 (62,000 gallons) and tank T-452 (115,000 gallons) receive hazardous waste heavy end distillation bottoms produced as a result of the distillation of crude EDC. The refined EDC is then further processed into VCM monomer while the hazardous waste heavy ends stored in tanks T-405 and T-452 are sent off-site for incineration. CSA#2 (1295 square feet; 200 – 55 gallon drum capacity) and CSA#3 (861 square feet; 160 – 55 gallon drum capacity) are currently interim status units and receive intermittently generated containerized hazardous wastes resulting from day-to-day plant operations. The containerized wastes are stored at CSA#2 and CSA#3 before shipment offsite for disposal.

V. FINANCIAL AND LIABILITY REQUIREMENTS

Georgia Gulf Lake Charles has submitted documentation to satisfy the financial assurance and liability requirements of LAC 33:V.Chapter 37.

VI. SUMMARY OF ENVIRONMENTAL FACTORS CONSIDERED

Pursuant to LA.R.S.30:2018.E.3, this draft hazardous waste operating permit is not subject to the requirements regarding environmental assessment statements or IT Analysis (Save Ourselves v. La. Env'tl. Control Comm'n, 452 So. 2d 1152, 1159. La. 1984). Nevertheless, the LDEQ has considered factors similar to the IT Analysis in preparing this draft permit. This is a preliminary analysis based on information currently available to the LDEQ.

- A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.**

Georgia Gulf Lake Charles submitted its Part B Permit Renewal Application for the Westlake Facility, which includes two (2) hazardous waste tanks (T-405 and T-452) and two (2) container storage areas (CSA#2 and CSA#3).

This permit addresses existing hazardous waste units and does not provide for the construction of new units or the expansion of existing units. Potential for releases to the environment is minimized due to the fact that all hazardous waste units possess secondary containment and due to strict operating standards set forth in the permit. Neither of the hazardous waste tanks vent directly to the atmosphere. The vents from the hazardous waste tanks are routed to thermal oxidizers.

- B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.**

The facility submitted a Part B Permit Renewal Application for a hazardous waste operating permit for existing hazardous waste units. The Georgia Gulf Lake Charles - Westlake Facility has been in operation for several decades and is located in a heavily industrialized area.

Nearly 100 area residents (78 Georgia Gulf employees and 21 full-time contract employees) are employed at the Georgia Gulf Lake Charles - Westlake Facility. Both the state and local economies benefit from the provision of employment and tax revenue. The proposed permit is an important factor for the continued operation of the Georgia Gulf Lake Charles - Westlake Facility.

As Georgia Gulf Lake Charles - Westlake Facility is an existing facility, the proposed operating hazardous waste renewal permit should have little or no affect on property values or public costs as they pertain to the economics of the local community. The proposed operating hazardous waste renewal permit should not promote the need for additional fire protection, police, medical facilities, or roads.

- C. There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.**

1. ALTERNATIVE PROJECTS

The facility submitted a Part B Permit Renewal Application for a hazardous waste operating permit for existing hazardous waste units. The Georgia Gulf Lake Charles - Westlake Facility has been in operation for several decades

and is located in a heavily industrialized area. The permitted units are critical to the operation of the Georgia Gulf Lake Charles – Westlake Facility. There appears to be no known alternative projects that would offer more protection to the environment than permitting the existing facilities without unduly curtailing non-environmental benefits.

2. ALTERNATIVE SITE

The facility submitted a Part B Permit Renewal Application for a hazardous waste operating permit for existing hazardous waste units. The Georgia Gulf Lake Charles - Westlake Facility has been in operation for several decades and is located in a heavily industrialized area. Relocating the facility's production/hazardous waste operations could result in greater environmental impact when siting and transportation of hazardous waste are considered.

3. MITIGATING MEASURES

The facility submitted a Part B Permit Renewal Application for a hazardous waste operating permit for existing hazardous waste units. Potential for releases to the environment is minimized due to the fact that all hazardous waste units possess secondary containment and due to strict operating standards set forth in the permit. Neither of the hazardous waste tanks vent directly to the atmosphere. The vents from the hazardous waste tanks are routed to thermal oxidizers.